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2122-CC00459 - ASHLEY SCOGGIN V HILL-ROM COMPANY INC (E-CASE)
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| 06/08/2021 | Alias Summons Issued Document ID: 21-SMCC-3580, for HILL-ROM COMPANY, INC. |
| 06/07/2021 | Alias Summons Requested Summons Request; Electronic Filing Certificate of Service. Filed By: MICHELLE KATHERINE FARON |
| 04/23/2021 | Motion Granted/Sustained Substitution of Counsel Granted. So Ordered: Judge Michael Stelzer #40716 Motion of Withdrawal of Counsel Motion to Withdraw. Filed By: JOSHUA MICHAEL PIERSON On Behalf Of: ASHLEY SCOGGIN |
| 04/22/2021 | Motion for Sub of Counsel Substitution of Counsel; Electronic Filing Certificate of Service. Filed By: JOHN CLAYTON SCHAEFFER On Behalf Of: ASHLEY SCOGGIN |
| 03/24/2021 | Summons Issued-Circuit Document ID: 21-SMCC-2020, for HILL-ROM COMPANY, INC. |
| 03/22/2021 | Jury Trial Scheduled Scheduled For: 09/07/2021; 9:00 AM ; MICHAEL FRANCIS STELZER; City of St. Louis |
| 03/10/2021 | Motion Special Process Server Request for Appointment of Special Process Server. Filed By: JOSHUA MICHAEL PIERSON On Behalf Of: ASHLEY SCOGGIN |
| 03/08/2021 | Judge/Clerk - Note THE SUMMONS WAS NOT ISSUED, PLEASE E-FILE THE REQUEST FOR SPECIAL PROCESS SERVER. |
| 03/04/2021 | Filing Info Sheet eFiling Filed By: JOSHUA MICHAEL PIERSON Note to Clerk eFiling Filed By: JOSHUA MICHAEL PIERSON Entry of Appearance Filed |

EXHIBIT A

Joshua M Pierson Entry of Appearance.

Filed By: JOSHUA MICHAEL PIERSON

On Behalf Of: ASHLEY SCOGGIN

Pet Filed in Circuit Ct

Petition; Ex 1 Charge of Discrimination; Ex 2 EEOC issued Right-to-Sue; Ex 3 MCHR issued Right-to-Sue.


Filed By: JOSHUA MICHAEL PIERSON

Judge Assigned



| | | |
|---|--|---|
| Judge or Division: MICHAEL FRANCIS STELZER | Case Number: 2122-CC00459 | Special Process Server 1 R HENDRICKS |
| Plaintiff/Petitioner: ASHLEY SCOGGIN | Plaintiff's/Petitioner's Attorney/Address JOHN CLAYTON SCHAEFFER 12166 OLD BIG BEND ROAD SUITE 99 KIRKWOOD, MO 63122 | Special Process Server 2 J HEFELE |
| Defendant/Respondent: HILL-ROM COMPANY, INC | Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101 | Special Process Server 3 W STAGE |
| Nature of Suit: CC Employmnt Discrmntn 213.111 | | (Date File Stamp) |

ALIAS Summons in Civil Case

| | | |
|--|--|---|
| The State of Missouri to: HILL-ROM COMPANY, INC Alias: RA: C T CORPORATION SYSTEM 120 S CENTRAL AVENUE CLAYTON, MO 63105 | | <div style="border: 1px solid black; padding: 5px; text-align: center; color: red; font-weight: bold;">SPECIAL PROCESS SERVER</div> |
|  | <p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p style="text-align: center;">June 8, 2021</p> <p style="text-align: center;">_____ Date</p> <p style="text-align: center;">_____ Clerk</p> <p>Further Information: _____</p> | |

| | |
|--|--|
| Sheriff's or Server's Return Note to serving officer: Summons should be returned to the court within 30 days after the date of issue. I certify that I have served the above summons by: (check one) <input type="checkbox"/> delivering a copy of the summons and a copy of the petition to the defendant/respondent. <input type="checkbox"/> leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent. <input type="checkbox"/> (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ (title). <input type="checkbox"/> other: _____ | |
| Served at _____ (address) in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time). <div style="display: flex; justify-content: space-between;"> <div> _____ Printed Name of Sheriff or Server (Seal) </div> <div> _____ Signature of Sheriff or Server Must be sworn before a notary public if not served by an authorized officer: Subscribed and sworn to before me on _____ (date). My commission expires: _____ <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>Date</div> <div>Notary Public</div> </div> </div> </div> | |

| | |
|--|--|
| Sheriff's Fees, if applicable Summons \$ _____ Non Est \$ _____ Sheriff's Deputy Salary Supplemental Surcharge \$ 10.00 Mileage \$ _____ (_____ miles @ \$._____ per mile) Total \$ _____ A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54. | |
|--|--|

**THE CIRCUIT COURT OF SAINT LOUIS CITY
STATE OF MISSOURI**

| | | |
|-------------------|---|---|
| ASHLEY SCOGGIN |) | |
| |) | |
| Plaintiff, |) | |
| |) | Cause No.: 2122-CC00459 |
| v. |) | |
| |) | Division |
| HILL-ROM CO. INC. |) | |
| |) | |
| |) | JURY TRIAL DEMANDED |
| Defendant. |) | |

SUMMONS REQUEST

COMES NOW, Plaintiff, and respectfully requests an Alias Summons be issued for the service of the petition and discovery upon Defendant Hill-Rom Co. Inc., at their registered agent CT Corporation System, 120 S. Central Avenue, Clayton, MO 63105 to be served by special process server Robyn Hendricks, John Hefe, and/or William L. Stage, Jr.

Respectfully submitted,

McMICHAEL, LOGAN, SCHAEFFER & GILPIN

/s/ Michelle K. Faron
J. Clayton Schaeffer, #67444
Michelle K. Faron, #68058
12166 Old Big Bend Rd., Suite 99
Kirkwood, MO 63122
(636) 532-1400 Office
(888) 823-1441 Facsimile
clay@mcmichael-logan.com
michelle@mcmichael-logan.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that on this 7th day of June, 2021, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system on all parties of record.

/s/ Michelle K. Faron

Based on the Supreme Court Rules governing eFiling, an eService email has been issued to the following parties:

SERVICE PARTY: JOHN CLAYTON SCHAEFFER, Attorney for Plaintiff
SERVICE EMAIL: clay@mcmichael-logan.com

IN THE CIRCUIT COURT FOR THE CITY OF ST. LOUIS
STATE OF MISSOURI

Ashley Scoggin,

Plaintiff,

vs.

Case No.: 2122-CC00459

Hill-Rom Co., Inc.,

Defendant.

Motion to Withdraw

I, Joshua M. Pierson, move to withdraw my appearance on behalf of plaintiff. Plaintiff remains represented. Withdrawal can be accomplished without material adverse effect on the interests of plaintiff.

/s/ Joshua M. Pierson
SilversteinWolf, LLC
Joshua M. Pierson, 65105
jp@silversteinwolf.com
530 Maryville Centre Dr., Suite 460
St. Louis, MO 63141
Telephone: (314) 744-4010
Facsimile: (314) 744-4026

Certificate of Service

On April 23, 2021, I served this Motion to Withdraw on counsel of record via the Court's electronic filing system.

/s/ Joshua M. Pierson

IN THE ST LOUIS CITY CIRCUIT COURT
STATE OF MISSOURI

FILED
APR 23 2021
22ND JUDICIAL CIRCUIT
CIRCUIT CLERK'S OFFICE
BY _____ DEPUTY

ASHLEY SCOGGIN,

Plaintiff,

v.

HILL-ROM COMPANY, INC.

Defendant.

Case No. 2122-CC00459

SUBSTITUTION OF COUNSEL

COME NOW, **Michelle Faron** and **J. Clayton Schaeffer** with the Law Firm of
McMichael, Logan, Schaeffer, & Gilpin and enter their appearances in substitution of attorney
Joshua Pierson.

Respectfully Submitted,

McMICHAEL & LOGAN

/s/ J. Clayton Schaeffer

J. Clayton Schaeffer, #67444
Attorney for Plaintiff
12166 Old Big Bend Rd., Suite 99
Kirkwood, MO 63122
(636) 532-1400 Office
(888) 823-1441 Facsimile
clay@mcmichael-logan.com

/s/ Michelle K. Faron

Michelle K. Faron, #68058
Attorney for Plaintiff
12166 Old Big Bend Rd., Suite 99
Kirkwood, MO 63122
(636) 532-1400 Office
(888) 823-1441 Facsimile
michelle@mcmichael-logan.com

ENTERED

APR 23 2021

MS

CERTIFICATE OF SERVICE

I certify that on this 22nd day of April, 2021, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system on all parties of record.

/s/ J. Clayton Schaeffer

So ordered
WJS
yds

CERTIFICATE OF SERVICE

I certify that on this 22nd day of April, 2021, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system on all parties of record.

/s/ J. Clayton Schaeffer

**IN THE ST LOUIS CITY CIRCUIT COURT
STATE OF MISSOURI**

ASHLEY SCOGGIN,

Plaintiff,

V.

HILL-ROM COMPANY, INC.

Defendant.

Case No. 2122-CC00459

SUBSTITUTION OF COUNSEL

COME NOW, **Michelle Faron** and **J. Clayton Schaeffer** with the Law Firm of
McMichael, Logan, Schaeffer, & Gilpin and enter their appearances in substitution of attorney
Joshua Pierson.

Respectfully Submitted,

McMICHAEL & LOGAN

/s/ J. Clayton Schaeffer

J. Clayton Schaeffer, #67444

Attorney for Plaintiff

12166 Old Big Bend Rd., Suite 99

Kirkwood, MO 63122

(636) 532-1400 Office

(888) 823-1441 Facsimile

clay@mcmichael-logan.com

/s/ *Michelle K. Faron*

Michelle K. Faron, #68058

Attorney for Plaintiff

12166 Old Big Bend Rd., Suite 99

Kirkwood, MO 63122

(636) 532-1400 Office

(888) 823-1441 Facsimile

michelle@mcmichael-logan.com

**SPECIAL PROCESS SERVER****IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI**

| | | |
|---|---|--------------------------------------|
| Judge or Division: MICHAEL FRANCIS STELZER | Case Number: 2122-CC00459 | Special Process Server 1 J HEFELE |
| Plaintiff/Petitioner: ASHLEY SCOGGIN | Plaintiff's/Petitioner's Attorney/Address JOSHUA MICHAEL PIERSON 530 MARYVILLE CENTRE DR. SUITE 460 ST. LOUIS, MO 63141 | Special Process Server 2 W STAGE |
| Defendant/Respondent: HILL-ROM COMPANY, INC | Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101 | Special Process Server 3 |
| Nature of Suit: CC Employmnt Discrmntn 213.111 | | (Date File Stamp) |

Summons in Civil Case**The State of Missouri to: HILL-ROM COMPANY, INC****Alias:**
RA: C T CORPORATION SYSTEM
120 S CENTRAL AVE
CLAYTON, MO 63105

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

March 24, 2021

Date

Clerk

Further Information:

Sheriff's or Server's Return**Note to serving officer:** Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ (title).
- ☐ other: _____.

Served at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

| | |
|-------------------------|--|
| Summons | \$ _____ |
| Non Est | \$ _____ |
| Sheriff's Deputy Salary | |
| Supplemental Surcharge | \$ 10.00 |
| Mileage | \$ _____ (_____ miles @ \$. _____ per mile) |
| Total | \$ _____ |

A copy of the summons and a copy of the petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

Based on the Supreme Court Rules governing eFiling, an eService email has been issued to the following parties:

SERVICE PARTY: JOSHUA MICHAEL PIERSON, Attorney for Plaintiff
SERVICE EMAIL: jp@silversteinwolf.com, joshpierson@gmail.com

In the
CIRCUIT COURT
 City of St. Louis, Missouri



For File Stamp Only

Ashley Scoggin
 Plaintiff/Petitioner

3/10/2021
 Date

vs.

2122-CC00459
 Case number

Hill-Rom Company, Inc.
 Defendant/Respondent

Division

REQUEST FOR APPOINTMENT OF PROCESS SERVER

Comes now Plaintiff, Ashley Scoggin, pursuant
 Requesting Party

to Local Rule 14, requests the appointment by the Circuit Clerk of

Robyn Hendricks P.O. Box 31321, St. Louis, MO 63131 (314) 966-2850
 Name of Process Server Address Telephone

John Hefe P.O. Box 31321, St. Louis, MO 63131 (314) 966-2850
 Name of Process Server Address Telephone

William L. Stage, Jr. P.O. Box 4931, St. Louis, MO 63108 (314) 420-2226
 Name of Process Server Address Telephone

to serve the summons and petition in this cause on the below named parties.

SERVE: Defendant, Hill-Rom Company, Inc.

R/A: CT Corporation System

Name

120 South Central Avenue

Address

Clayton, MO 63105

City/State/Zip

SERVE:

Name

Address

City/State/Zip

Appointed as requested:

TOM KLOEPPINGER, Circuit Clerk

By

Deputy Clerk

Date

SERVE:

Name

Address

City/State/Zip

SERVE:

Name

Address

City/State/Zip

[Signature]
 Attorney/Plaintiff/Petitioner

65105

Bar No.

530 Maryville Centre Dr., Ste 460, St. Louis, MO 63141

Address

(314) 744-4010

Phone No.

In the
CIRCUIT COURT
 City of St. Louis, Missouri



For File Stamp Only

Ashley Scoggin
 Plaintiff/Petitioner

3/10/2021
 Date

vs.

2122-CC00459
 Case number

Hill-Rom Company, Inc.
 Defendant/Respondent

Division

REQUEST FOR APPOINTMENT OF PROCESS SERVER

Comes now Plaintiff, Ashley Scoggin, pursuant
 Requesting Party

to Local Rule 14, requests the appointment by the Circuit Clerk of

Robyn Hendricks P.O. Box 31321, St. Louis, MO 63131 (314) 966-2850
 Name of Process Server Address Telephone

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 Name of Process Server Address Telephone

to serve the summons and petition in this cause on the below named parties.

SERVE: Defendant, Hill-Rom Company, Inc.

R/A: CT Corporation System

Name

120 South Central Avenue

Address

Clayton, MO 63105

City/State/Zip

SERVE:

Name

Address

City/State/Zip

Appointed as requested:

TOM KLOEPPINGER, Circuit Clerk

By [Signature]
 Deputy Clerk

Date

3-24-21

SERVE:

Name

Address

City/State/Zip

SERVE:

Name

Address

City/State/Zip

[Signature]
 Attorney/Plaintiff/Petitioner

65105

Bar No.

530 Maryville Centre Dr., Ste 460, St. Louis, MO 63141

Address

(314) 744-4010

Phone No.

IN THE CIRCUIT COURT FOR THE CITY OF ST. LOUIS
STATE OF MISSOURI

Ashley Scoggin,

Plaintiff,

vs.

Hill-Rom Company, Inc.,

Defendant.

Case No.

JURY TRIAL DEMANDED

PETITION

1. Plaintiff sues for sex discrimination under Title VII of the Civil Rights Act of 1964 and the Missouri Human Rights Act.

Jurisdiction, Venue, and the Parties

2. The amount in controversy exceeds \$25,000.
3. Plaintiff is defendant's former employee and female.
4. Plaintiff is a Missouri citizen, and the events described here occurred in the City of St. Louis.
5. Defendant is authorized to do business in the State of Missouri and does so.

Administrative Process

6. Plaintiff filed a charge of discrimination with the Equal Employment Opportunity Commission (EEOC) and the Missouri Commission on Human Rights (MCHR). Ex.1.
7. On December 4, 2020, the EEOC ended its administrative process and issued a notice of right to sue. Ex.2. Plaintiff brings suit within 90 days.
8. On December 11, 2020, the MCHR ended its administrative process and issued a notice of right to sue. Ex.3. Plaintiff brings suit within 90 days.
9. Plaintiff exhausted all administrative prerequisites to suit.

Allegations

10. Plaintiff began working for defendant in November 2018.
11. Defendant contracted with Barnes Jewish Hospital in St. Louis to provide services.
12. Plaintiff's job required her to clean medical equipment at Barnes Jewish Hospital.
13. In February 2020, plaintiff learned she was pregnant.
14. Around March 2020, the COVID-19 pandemic had begun to move through the nation and St. Louis, making news and causing civic and business closures.
15. Around March 2020 plaintiff told her manager, Daniel Scott, that she was pregnant.
16. On March 27, 2020, plaintiff and others asked defendant what steps the company was taking to ensure plaintiff and her coworkers would not become infected with COVID-19.
17. On March 27, 2020, rather than answer plaintiff's question about COVID safety, Daniel Scott met with plaintiff and fired her.
18. Scott claimed to fire plaintiff for cursing on the job two weeks before.
19. Plaintiff had not cursed on the job.
20. Other, non-pregnant employees curse without reprimand or termination.
21. Defendant treated plaintiff more severely than employees that were not pregnant, firing her because of her pregnancy and sex.

Count I—MHRA Sex Discrimination

22. Plaintiff incorporates Paragraphs 1 through 21.
23. Defendant fired plaintiff because of her pregnancy, in violation of the Missouri Human Rights Act, Mo.Rev.Stat. § 213.010, *et seq.*

24. As a direct and proximate result of defendant's termination of plaintiff's employment, plaintiff has and will continue to suffer damages including lost wages, benefits, and emotional distress.

Count II—Title VII Sex Discrimination

25. Plaintiff incorporates Paragraphs 1 through 21.

26. Defendant fired plaintiff because of her pregnancy, in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e-2.

27. As a direct and proximate result of defendant's termination of plaintiff's employment, plaintiff has and will continue to suffer damages including lost wages, benefits, and emotional distress.

WHEREFORE, plaintiff asks the Court to enter its Order, Judgment, and Decree awarding her reinstatement, or equitable front pay in lieu thereof, lost income and benefits, compensatory damages, attorneys' fees and costs, and any other relief the Court deems just.

/s/ Joshua M. Pierson
SilversteinWolf, LLC
Joshua M. Pierson, 65105
jp@silversteinwolf.com
Jill A. Silverstein, 34433
js@silversteinwolf.com
530 Maryville Centre Dr., Suite 460
St. Louis, Missouri 63141
Telephone: (314) 744-4010
Facsimile: (314) 744-4026

Attorneys for the Plaintiff

CHARGE OF DISCRIMINATION**2122-CC00459**

This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.

☐ FEPA
☒ EEOC

560-2020-01681

MISSOURI HUMAN RIGHTS COMMISSION

and EEOC

State or local Agency, if any

NAME (Indicate Mr., Ms., Mrs.)

Ms. Ashley Scoggin

HOME TELEPHONE (Include Area Code)

STREET ADDRESS

CITY, STATE AND ZIP CODE

DATE OF BIRTH

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME

HillRom

NUMBER OF EMPLOYEES, MEMBERS

300+

TELEPHONE (Include Area Code)

1-800-617-9784

STREET ADDRESS

1069 State Road 46 East, Batesville, Indiana 47006

CITY, STATE AND ZIP CODE

COUNTY

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

☐

RACE

☐

COLOR

☒

SEX

☐

RELIGION

☐

AGE

☐

RETALIATION

☐NATIONAL
ORIGIN☐

DISABILITY

☐

OTHER (Specify)

DATE DISCRIMINATION TOOK PLACE

EARLIEST (ADEA/EPA)

LATEST (ALL)

March 27, 2020

☐

CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I worked for HillRom at Barnes Jewish Hospital in the City of St. Louis starting in November 2018.

On around March 11, 2020 I told my manager, Daniel Scott, I was pregnant.

On March 26, 2020 I told my immediate supervisor, Raymond Butler, that I was concerned about being pregnant and possibly being exposed to COVID-19 patients at work. Me and others asked if Butler could look into HillRom's leave policies. Butler told us he would ask Scott about the issue.

On March 27, 2020 Scott fired me, accusing me of using profanity at work when I had not done so and when at least one other, male employee had used profanity at work and was not fired.

I believe HillRom fired me because I am pregnant.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - (When necessary for State and Local Requirements)

SIGNATURE OF COMPLAINANT

I declare under penalty of perjury that the foregoing is true and correct.

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE

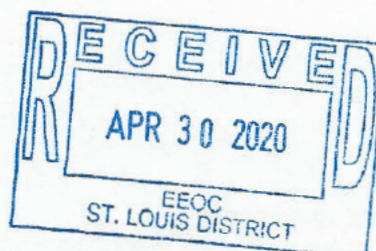
(Day, month, and year)

Date 4/28/20

Charging Party (Signature)

28/4/20

EEOC FORM 5 (10/94)



EEOC Form 161-B (11/16)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)

To: Ashley Scoggin



From: St. Louis District Office
 1222 Spruce Street
 Room 8.100
 Saint Louis, MO 63103

☐

On behalf of person(s) aggrieved whose identity is
 CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

560-2020-01681

Kenneth E. Waters,
Investigator

(314) 798-1932

(See also the additional information enclosed with this form.)

NOTICE TO THE PERSON AGGRIEVED:

Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), or the Genetic Information Nondiscrimination Act (GINA): This is your Notice of Right to Sue, issued under Title VII, the ADA or GINA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII, the ADA or GINA **must be filed in a federal or state court WITHIN 90 DAYS of your receipt of this notice;** or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

☒

More than 180 days have passed since the filing of this charge.

☐

Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of this charge.

☒

The EEOC is terminating its processing of this charge.

☐

The EEOC will continue to process this charge.

Age Discrimination in Employment Act (ADEA): You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, **the paragraph marked below applies to your case:**

☐

The EEOC is closing your case. Therefore, your lawsuit under the ADEA **must be filed in federal or state court WITHIN 90 DAYS of your receipt of this Notice.** Otherwise, your right to sue based on the above-numbered charge will be lost.

☐

The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of the charge, you may file suit in federal or state court under the ADEA at this time.

Equal Pay Act (EPA): You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission

Lloyd J. Vasquez, Jr.,
District Director

DEC 04 2020

(Date Mailed)

Enclosures(s)

CC:

Kristen Gordon
Human Resources Director
Hill Rom Company, Inc.
1069 State Road 46 East
Batesville, IN 47006

Jennifer Chierek Znosko
Little Mendelson, P.C.
600 Washington Avenue
Suite 900
St. Louis, MO 63101

Joshua M. Pierson
Silverstein Wolf, LLC
530 Maryville Center Dr.
Suite 460
Saint Louis, MO 63141



MICHAEL L. PARSON
GOVERNOR

ANNA S. HUI
DEPARTMENT DIRECTOR

MARTHA STAGGS
COMMISSION CHAIR

ALISA WARREN, PH.D.
EXECUTIVE DIRECTOR

MISSOURI COMMISSION ON HUMAN RIGHTS

2122-CC00459

Administrative Use/Records

FE-4/20-31872

Electronically Filed - City of St. Louis - March 04, 2021 - 06:00 PM

Ashley Scoggin

RE: Scoggin vs. HillRom
FE-4/20-31872 560-2020-01681

The Missouri Commission on Human Rights (MCHR) is terminating its proceedings and issuing this notice of your right to sue under the Missouri Human Rights Act because you have requested a notice of your right to sue.

This letter indicates your right to bring a civil action within 90 days of this notice against the respondent(s) named in the complaint. Such an action may be brought in any circuit court in any county in which the unlawful discriminatory practice is alleged to have occurred but it must be brought no later than two years after the alleged cause occurred or its reasonable discovery. Upon issuance of this notice, the MCHR is terminating all proceedings relating to the complaint. No person may file or reinstate a complaint with the MCHR after the issuance of a notice of right to sue relating to the same practice or act. You are hereby notified of your right to sue the Respondent(s) named in your complaint in state circuit court. **THIS MUST BE DONE WITHIN 90 DAYS OF THE DATE OF THIS NOTICE OR YOUR RIGHT TO SUE IS LOST.**

You are also notified that the Executive Director is hereby administratively closing this case and terminating all MCHR proceedings relating to it. This notice of right to sue has no effect on the suit-filing period for any federal claims. This notice of right to sue is being issued as required by Section 213.111.1, RSMo, because it has been over 180 days after the filing of this complaint and MCHR has not completed its administrative processing.

Respectfully,

Alisa Warren Ph.D.
Executive Director

December 11, 2020
Date

HillRom
1069 State Road 46 East
Batesville, IN 47006

Joshua M. Pierson
SilversteinWolf, LLC
530 Maryville Center Drive, Suite 460
St. Louis, MO 63141
Via email



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Missouri Commission on Human Rights is an equal opportunity employer/program. Auxiliary aides and services are available upon request to individuals with disabilities.

TDD/TTY: 1-800-735-2966 (TDD) Relay Missouri: 711
www.labor.mo.gov/mohumanrights E-Mail: mchr@labor.mo.gov

Exhibit 3

IN THE CIRCUIT COURT FOR THE CITY OF ST. LOUIS
STATE OF MISSOURI

Ashley Scoggin,

Plaintiff,

vs.

Hill-Rom Company, Inc.,

Defendant.

Case No.

JURY TRIAL DEMANDED

ENTRY OF APPEARANCE

COMES NOW Joshua M. Pierson and hereby enters his appearance as counsel for Plaintiff, Ashley Scoggin, in the above-captioned case.

/s/ Joshua M. Pierson
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